

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

SCOTT K. BRADLEY,

Defendant.

Case No. 07-20627

HON. Marianne Battani

**DEFENDANT BRADLEY'S REPLY TO GOVERNMENT'S
SENTENCING MEMORANDUM AND MOTION FOR
DOWNWARD DEPARTURE**

NOW COMES the Defendant, Scott Bradley, by and through his attorney, Neil H. Fink, and submits his reply to the Government's Sentencing Memorandum and Motion for Downward Departure.

The Government in its Memorandum invents the term "de facto" "Chief Financial Officer of the business" in describing Defendant Bradley's role in the offense. In truth and in fact, Bradley's participation when viewed in its totality was little more than that of a glorified bookkeeper with little, if any independent decision making power. To be sure the Government in its lengthy investigation which culminated in a search warrant with thousands of pieces of paper and witness interviews, can take bits and pieces and connect them to make Bradley look as bad as possible in the eyes of the Court. This is not an accurate portrayal.

The Defendant stands by his previously filed Sentencing Memorandum.

Respectfully submitted:

s/Neil H. Fink

Neil H. Fink (P13430)

Attorney for Defendant

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NEIL H. FINK, being first duly sworn, deposes and says that on the 16th day of November, 2009, he served **Defendant Bradley's Reply to Government's Sentencing Memorandum and Motion for Downward Departure**, and this **Certificate of Service** using the ECF system which will send notification upon:

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